

From: [Halter, Julie Anne](#)
To: [Van Der Weele, Philip](#); [Veronica L. Manolio](#); "[mccune @bodyfeltmount.com](#)"
Cc: [Wyant, Christopher M.](#); [White, Elizabeth H.](#); [Halter, Julie Anne](#)
Subject: RE: POA PBI/26f
Date: Thursday, September 24, 2020 12:35:37 PM
Attachments: [Production Format Requirements RINGTAIL.pdf](#)

Thanks very much for the 26(f) discussion this afternoon. As discussed, attached are our standard format of document production specifications which outline how we'd like to receive production material. We'll look forward to hearing from you regarding your preferred specifications as well.

Thanks very much,
Julie Anne



Julie Anne Halter

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From: Van Der Weele, Philip <phil.vanderweele@klgates.com>
Sent: Monday, September 21, 2020 2:43 PM
To: Veronica L. Manolio <vmanolio@mf-firm.com>; 'mccune @bodyfeltmount.com' <mccune@bodyfeltmount.com>
Cc: Wyant, Christopher M. <Christopher.Wyant@klgates.com>; White, Elizabeth H. <Elizabeth.White@klgates.com>; Halter, Julie Anne <julianne.halter@klgates.com>
Subject: RE: POA PBI/26f

Hi Veronica,

Another item I wish to start discussions on in advance of our 26f is the protective order. To that end, I am attaching the District of Oregon's model 2-tier protective order. I have more complicated POs in my forms file, some of which were the subject of extensive negotiations, and I'm sure that you do as well, but I think that this model order gets the job done, and it is what a judge is going to turn to anyway in this district if the parties can't agree. I therefore propose that we just stipulate to this model order.

Regards,
Phil

From: Van Der Weele, Philip
Sent: Monday, September 21, 2020 2:12 PM
To: 'Veronica L. Manolio' <vmanolio@mf-firm.com>; 'mccune @bodyfeltmount.com' <mccune@bodyfeltmount.com>
Cc: Wyant, Christopher M. <Christopher.Wyant@klgates.com>; White, Elizabeth H. <Elizabeth.White@klgates.com>; Halter, Julie Anne <julieanne.halter@klgates.com>
Subject: RE: POA PBI/26f

Hi Veronica,

I think it's helpful for the parties to exchange their views on the case schedule in advance of the 26f in order to maximize the chances of reaching agreement. That is especially true here, where we have a relatively short period of time between the 26f and the deadline for filing our report. To that end, I am attaching PBI's proposal. It is designed to move the case forward rapidly, while allowing both parties to defer what would undoubtedly be the substantial expense of expert reports and expert depositions - expenses that may otherwise be avoidable.

I look forward to your thoughts on the schedule (or any other topics) in advance of the 26f as well.

Regards,
Phil

From: Van Der Weele, Philip
Sent: Monday, September 14, 2020 11:02 AM
To: 'Veronica L. Manolio' <vmanolio@mf-firm.com>; 'mccune @bodyfeltmount.com' <mccune@bodyfeltmount.com>
Cc: Wyant, Christopher M. <Christopher.Wyant@klgates.com>; White, Elizabeth H. <Elizabeth.White@klgates.com>; Halter, Julie Anne <julieanne.halter@klgates.com>
Subject: RE: POA PBI/26f

Hi Veronica,

Please let me know times you are available for the 26f next week Sept 23-25. I

think you are an hour ahead of us. Good starting times for me are 11:30 or later your time.

Thx,
Phil

From: Veronica L. Manolio <vmanolio@mf-firm.com>
Sent: Thursday, August 27, 2020 2:38 PM
To: 'mccune @bodyfeltmount.com' <mccune@bodyfeltmount.com>; Van Der Weele, Philip <phil.vanderweele@klgates.com>
Cc: Wyant, Christopher M. <Christopher.Wyant@klgates.com>; White, Elizabeth H. <Elizabeth.White@klgates.com>
Subject: Re: redline of DRAFT Status Report 8-27-20_.doc

External Sender:

I am totally fine with your changes and will accept them and get this on file shortly. Just let me know when your schedule will allow so we can do our Rule 26(f) meeting. Thanks so much.

Veronica

p.s. Please forgive typos and grammar mistakes. I blame voice recognition.

From: Van Der Weele, Philip <phil.vanderweele@klgates.com>
Sent: Thursday, August 27, 2020 2:24:55 PM
To: Veronica L. Manolio <vmanolio@mf-firm.com>; 'mccune @bodyfeltmount.com' <mccune@bodyfeltmount.com>
Cc: Wyant, Christopher M. <Christopher.Wyant@klgates.com>; White, Elizabeth H. <Elizabeth.White@klgates.com>
Subject: redline of DRAFT Status Report 8-27-20_.doc

Hi Veronica,

Thx for sending. Redline attached - I deleted the reference to the early settlement conference, b/c we didn't raise that possibility in the initial motion, so it wasn't part of the basis for the extension.

Regards,
Phil

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at phil.vanderweele@klgates.com.

e-Discovery Analysis & Technology (e-DAT) Group

K&L GATES FORMAT OF PRODUCTION SPECIFICATIONS

DATA FORMAT

ALL data received for loading into K&L Gates Litigation Support Tools must adhere to the following specifications:

- Provide .DAT and .OPT files that adhere to the specifications described below.
- Group 4 single page TIFs w/ .OPT file supplied for loading images into image viewer. Keep document composition within output folders. (Do not split documents across folders.)
- Extracted Text (or OCR if extracted text is not available or a document is redacted) must be supplied as multi-page text files. The text files should reside in the same directory as the images and be named with the corresponding beginning Bates number of the document.
- Native files: If non-redacted Excel files exist in your production, produce a single-page slip sheet (place holder image) along with a copy of the native file. The native file should reside in the same directory as the Images and Extracted Text files and be named with the corresponding beginning Bates number of the document.
- The DAT file delimiters will be:

Comma | (020)

Quote b (254)

Newline @ (174)

*Multi-value fields: multiple values in a single field should be separated by semi-colons (;)

STANDARD FIELDS

Following is the list of standard fields to be provided in the DAT file, if the source of the TIF images is Electronically Stored Information ("ESI"):

BEGDOC#	BEGINNING production bates number of document
ENDDOC#	ENDING production bates number of document
BEGATT	BEGINNING attachment range
ENDATT	ENDING attachment range
POD	Protective Order Designation
PAGECOUNT	Number of pages per file
FILENAME	Filename of document
FILEPATH	Original path to file

FILESIZE	Byte size of native ESI file
CUSTODIAN	Document custodian
AUTHOR	Author of document
*TO	Email Recipient(s)
FROM	Email Author
*CC	Email Copyee(s)
*BCC	Email Blind Copyee(s)
DATECREATED	Date document created MM/DD/YYYY
TIMECREATED	Time document created 24 hour
DATESENT	Email sent date MM/DD/YYYY
TIMESENT	Email sent time 24 hour
DATERCVD	Email received date MM/DD/YYYY
DATELASTMOD	Date last modified MM/DD/YYYY
SENTMODDATE	Sent date (email) or last modified date (non-email)....MM/DD/YYYY
SENTMODDATE_FAMILY	SENTMODDATE of parent populated for all records in the family....MM/DD/YYYY
SUBJECT	Email Re or Subject line
DOCTITLE	Document Title
TITLE	Subject (email) or filename (non-email)
*ATTACHMENT TITLE(S)	Subject (email) or filename (non-email) of attachment(s) - populated for parent records only
DOCTYPE	File type extension
MD5 HASH	MD5 Hash Value
CONVERSATIONINDEX	Email thread identification
REDACTION APPLIED	Code as YES if a redaction is present
OCR_LINK	Link to Multi-page text file containing EXTRACTED TEXT (e.g. \IMAGES\TEST-T00000001.txt)
NATIVE_LINK	Link to native files (e.g. \IMAGES\TEST-T00000001.xlsx)

Following is the list of standard fields to be provided in the DAT file, if the source of the TIF images is scanned hard copy documents:

BEGDOC#	BEGINNING production bates number of document
ENDDOC#	ENDING production bates number of document
BEGATT	BEGINNING attachment range
ENDATT	ENDING attachment range
PAGECOUNT	Number of pages per file
CUSTODIAN	Document custodian
POD	Protective Order Designation

LOAD FILES

Provide an Opticon (.OPT) file for loading that contains the full path and related bates number for each image as follows. The OPT should also include the standard OPT format document composition notation.

For example:

```
TEST-T00000001,TEST_001,\\IMAGES\TEST_001\IMAGES\001\TEST-T00000001.tif,Y,,,2
TEST-T00000002,TEST_001,\\IMAGES\TEST_001\IMAGES\001\TEST-T00000002.tif,,,,,
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